

EXHIBIT L

RESPONSE:

None.

INTERROGATORY NO. 23

Please set forth the Debtors' position on whether the surviving entities (FWE I, FWE III, FWE IV) contend that they will be the principals on any existing bonds post-confirmation. If any of the surviving entities do intend to be principals on certain bonds, provide a list of each bond and the associated surviving entity which is intended to be the principal.

RESPONSE:

The Debtors object to this Request as premature and calling for speculation about future events.

INTERROGATORY NO. 24

Please set forth the Debtors' position on how the existing surety bonds are intended to be allocated amongst the buckets under the Plan. For example, if a BOEM bond is for a lease which interest is being split between two or more entities, how will the BOEM bond be allocated to those entities, and do the Debtors have regulatory approval for such allocation. Please provide an answer for all bonds that have bonded assets being split between two or more entities under the Plan.

RESPONSE:

Neither the Plan nor Disclosure Statement provide that any bonds will be split, assumed, assigned, or otherwise transferred.

INTERROGATORY NO. 25

Please advise whether it is the Debtors' intent to reject each of the surety bond indemnity agreements in the Bankruptcy Cases.

RESPONSE:

The indemnity agreements are not executory contracts.

INTERROGATORY NO. 26

Please identify in which class of claims the Plan places Apache.

RESPONSE:

Class 6B.